

IN THE CIRCUIT COURT FOR
ANNE ARUNDEL COUNTY, MARYLAND

CAROL ADAMS
6801 White Water Way
Apartment 301
Glen Burnie, Maryland 21060

Plaintiff,

vs.

WALMART, INC.
701 South Walton Boulevard
Bentonville, Arkansas 72716

SERVE ON:
The Corporation Trust Incorporated
2405 York Road
Suite 201
Lutherville Timonium, Maryland 21093

Defendant.

Case No. C-02-CV-21-000356

COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff, Carol Adams, by undersigned counsel, hereby files this Complaint against WalMart, Inc., Defendant herein, and alleges as follows:

I. JURISDICTION AND VENUE

1. Plaintiff invokes the jurisdiction of this Court pursuant to Md. Code Ann., Cts. and Jud. Proc. Article, § 6-101 et seq.

2. Venue is proper in this Court pursuant to Md. Code Ann., Cts. & Jud. Proc. Article, §§ 6-201 and 6-202.

3. The amount in controversy herein exceeds the sum of \$30,000.00 exclusive of interest and costs.

II. PARTIES

4. Carol Adams ("Adams") is a citizen of the State of Maryland with a residence in Anne Arundel County at 6801 White Water Way, Apartment 301, Glen Burnie, Maryland 21060.

5. WalMart, Inc. ("WalMart Stores") is a Delaware based Corporation with its principal place of business located at 701 South Walton Boulevard, Bentonville, Arkansas 72716. Upon information and belief, WalMart Stores, Inc. operates many retail stores throughout Maryland, one of which is located at 6721 Chesapeake Center Drive, Glen Burnie, Maryland 21060.

III. FACTS

6. On or about October 24, 2019, Adams was an invitee at the Walmart Superstore located at 6721 Chesapeake Center Drive, Glen Burnie, Maryland 21060 ("Premises"). As Adams was walking in the store, she slipped on liquid that had accumulated on the floor causing her to fall to the ground and sustain profound and painful injuries to her shoulder, neck, head, back, and body. As a result of the injuries sustained, Adams was forced to incur substantial medical bills. As of the date of the filing of this Complaint, Adams is still experiencing periodic pain and discomfort as result of the injuries she sustained as a result

of her fall on October 24, 2019 and may be in need of future medical care.

7. At all times prior to her fall, Adams maintained a proper and vigilant outlook as she walked through the Wal-Mart store and her actions in no way contributed to her fall. To the contrary, Adams' injuries were solely the result of the unreasonable acts and omissions of Defendant, WalMart Stores.

8. Prior to this accident, WalMart Stores knew or should have known that (1) liquid had accumulated on the floor of the store where Adams fell; and (2) no adequate warnings were posted to alert patrons, like Adams, of the dangerous condition of the liquid on the floor of the Premises. Notwithstanding said knowledge and notice, WalMart Stores failed to take reasonable actions to prevent and/or cure the hazardous conditions which it knew or should have known could result in injuries to their customers.

COUNT I
(Negligence)

9. Plaintiff hereby incorporates by reference the allegations contained in paragraphs 1-8.

10. Walmart Stores, at all times material to this Complaint, was in possession, custody and control of the property known as 6721 Chesapeake Center Drive, Glen Burnie, Maryland 21060. As such, Walmart Stores owed a duty to Adams,

and all invitees who were lawfully on the premises, to properly maintain the walkways on the Premises free from the dangerous accumulation of liquid which could cause injury. Walmart Stores also had a duty to warn Adams, and all other patrons lawfully entering onto the property, of any defects, dangers or other hazardous conditions which existed on the property.

11. On or about October 24, 2019, Walmart Stores breached the duties of care it owed to Adams by failing to (1) take reasonable actions to ensure that the floors on the Premises were free from the dangerous accumulation of liquid; and (2) warn Adams, and other patrons lawfully on the Premises, of the aforementioned dangerous conditions of which it knew or should have known existed as of the time of Adams' fall.

12. As a result of Walmart Stores' breaches of the duties of care owed to Adams, Adams sustained substantial damages.

WHEREFORE, Plaintiff, Carol Adams, prays that the Court enter judgment in her favor and against Defendant, Walmart Stores, Inc., for compensatory damages in the amount exceeding \$75,000.00, with the exact amount to be determined at trial, plus pre-judgment interest, costs, and such other and further relief as justice may require.

Respectfully submitted,



Thomas C. Costello, #9412430142
Matthew T. Holley, #1306190131
tcc@costellolawgroup.com
mth@costellolawgroup.com
Costello Law Group
409 Washington Avenue, Suite 410
Towson, Maryland 21204
(410) 832-8800

Attorneys for Plaintiff,
Carol Adams

JURY TRIAL DEMANDED

Plaintiff hereby demands and request that all claims, actions and causes of action set forth herein be tried before a jury.



Matthew T. Holley

CERTIFICATE IN COMPLIANCE WITH RULE 20-201(F)

I certify that this submission does not contain any restricted information as defined by Maryland Rule 20-101(s).



Matthew T. Holley